

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Spectrum Policy Task Force Seeks)	ET Docket No. 02-135
Public Comment On Issues Related)	
To Commission's Spectrum Policies)	
)	
Public Notice FCC 02-322)	
)	

Reply Comments of
Warren C. Havens and Telesaurus Holdings GB, LLC
DBA LMS Wireless

Warren C. Havens ("Havens") and Telesaurus Holdings GB, LLC ("Telesaurus") together DBA "LMSW," submitted several filings in this docket describing services which new spectrum policies may facilitate, including in regards to Intelligent Transportation Systems. LMSW, environmental monitoring, shared public safety and commercial wireless systems and services, and special rural and homeland security applications. These are innovative proposals of high potential for public service. LMSW asks that the Task Force consider the policy principals in these filings in its spectrum policy proceedings.¹

LMWS strongly supports and appreciates the principal findings and recommendations in the November 2002 Task Force report and finds these to be the sort of bold intelligent policy directions that are needed. LMSW understands, however, that it will most likely take years for

¹ In addition, while the LMSW proposals had substantial commercial purposes, they also involve may applications which may result in little or no direct commercial benefit to the licensees involved, including LMSW, instead focusing on important services for the public benefit (some to be undertaken via non-profit ventures).

such policies to be decided upon and substantially implemented. Accordingly, LMSW proposes the following:

The Task Force should implement interim policies as soon as possible, by the end of year 2003, consistent with its November 2002 report, which licensees in various commercial wireless services may voluntarily adopt, and offer incentives for such adoption (“Interim Spectrum Policies”). For example, the LMS services involves both high-power wide-area licenses, and low-power unlicensed Part 15 devices and systems using the same spectrum. LMSW desires to work with the Part 15 interests on appropriate technologies and systems involving its LMS licensed operations and Part 15 operations, to maximize each one and in fact to coordinate both into certain technology, systems, and applications. Such endeavor (beyond what is required in the Part 90, Subpart M rules regarding the LMS service), are consistent with the Task Force recommendations to date, and should result in some reasonable accommodations or incentives. Similar incentives may be offered for wireless services, whether pursued by LMSW and LMS licensees or other entities and service licensees, who spend time and resources on innovative new technologies and services for purposes recognized to be of high public interest, such as noted above, when these are consistent with such above-proposed Interim Spectrum Policies.

Respectfully submitted,

Warren Havens

Warren Havens and
Telesaurus Holdings GB LLC
DBA, LMS Wireless
2509 Stuart Street, Berkeley CA 94705
Phone 510 841 2220, Fax 510 841 2226

Filed via the FCC ECSF, February 10, 2003